

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO. 5:14-cv-298-D**

JAMES M. POUNDS, III and wife,
MICHELLE POUNDS

Plaintiffs,

v.

LOCKHEED MARTIN CORPORATION,
LOCKHEED MARTIN GOVERNMENT
SERVICES, INC., LOCKHEED MARTIN
SERVICES, INC., LOCKHEED
MARTIN OPERATIONS SUPPORT,
INC., LOCKHEED MARTIN LOGISTICS
MANAGEMENT, INC., LOCKHEED
MARTIN LOGISTIC SERVICES, INC.,
LOCKHEED MARTIN ASPEN
SYSTEMS CORPORATION,
LOCKHEED MARTIN GLOBAL
TELECOMMUNICATIONS SERVICES,
INC., XEROX STATE & LOCAL
SOLUTIONS, INC., LOCKHEED
MARTIN INFORMATION
TECHNOLOGY COMMERCIAL CORP.,
LOCKHEED MARTIN MANAGEMENT
SYSTEMS DESIGNERS, INC., SYTEX,
INC., LOCKHEED MARTIN
TECHNICAL OPERATIONS
COMPANY, and LOCKHEED MARTIN
TRAINING SOLUTIONS, INC.,

Defendants.

**DEFENDANT XEROX STATE & LOCAL
SOLUTIONS, INC.'S ANSWER**

NOW COMES defendant Xerox State & Local Solutions, Inc., through counsel,
and answers the allegations contained in plaintiffs' Complaint as follows:

PARTIES

1. This answering defendant does not have sufficient information to form a
belief as to the truth or falsity of the allegations contained in paragraph 1, and the same
are therefore denied.

2. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 2, and the same are therefore denied.

3. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 3, and the same are therefore denied.

4. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 4, and the same are therefore denied.

5. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 5, and the same are therefore denied.

6. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 6, and the same are therefore denied.

7. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 7, and the same are therefore denied.

8. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 8, and the same are therefore denied.

9. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 9, and the same are therefore denied.

10. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 10, and the same are therefore denied.

11. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 11, and the same are therefore denied.

12. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 12, and the same are therefore denied.

13. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 13, and the same are therefore denied.

14. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 14, and the same are therefore denied.

15. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 15, and the same are therefore denied.

16. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 16, and the same are therefore denied.

17. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 17, and the same are therefore denied.

18. With regard to the allegations contained in paragraph 18 of the Complaint, it is admitted that Xerox State & Local Solutions, Inc. is a foreign corporation. Except as herein expressly admitted, the allegations contained in paragraph 18 are denied.

19. The allegations contained in paragraph 19 are admitted.

20. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 20, and the same are therefore denied.

21. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 21, and the same are therefore denied.

22. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 22, and the same are therefore denied.

23. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 23, and the same are therefore denied.

24. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 24, and the same are therefore denied.

25. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 25, and the same are therefore denied.

26. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 26, and the same are therefore denied.

27. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 27, and the same are therefore denied.

28. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 28, and the same are therefore denied.

29. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 29, and the same are therefore denied.

FACTS

30. Paragraphs 1 through 29 of this Answer are hereby re-alleged and incorporated by reference as are fully set forth herein.

31. No response is required with respect to the allegations contained in paragraph 31 of the Complaint. However, to the extent a response is deemed to be required, or to the extent these allegations attempt to establish liability of the part of this answering defendant, they are denied.

32. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 32, and the same are therefore denied.

33. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 33, and the same are therefore denied.

34. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 34, and the same are therefore denied.

35. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 35, and the same are therefore denied.

36. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 36, and the same are therefore denied.

37. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 37, and the same are therefore denied.

38. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 38, and the same are therefore denied.

39. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 39, and the same are therefore denied.

40. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 40, and the same are therefore denied.

41. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 41, and the same are therefore denied.

42. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 42, and the same are therefore denied.

43. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 43, and the same are therefore denied.

44. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 44, and the same are therefore denied.

45. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 45, and the same are therefore denied.

46. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 46, and the same are therefore denied.

FIRST CLAIM FOR RELIEF: NEGLIGENCE PER SE

47. Paragraphs 1 through 46 of this Answer are hereby re-alleged and incorporated by reference as are fully set forth herein.

48. The allegations contained in paragraph 48 are denied as to this answering defendant.

49. The allegations contained in paragraph 49 are denied as to this answering defendant.

50. The allegations contained in paragraph 50 are denied as to this answering defendant.

51. The allegations contained in paragraph 51 are denied as to this answering defendant.

52. The allegations contained in paragraph 52 are denied as to this answering defendant.

53. The allegations contained in paragraph 53 are denied as to this answering defendant.

54. The allegations contained in paragraph 54 are denied as to this answering defendant.

55. The allegations contained in paragraph 55 are denied as to this answering defendant.

56. The allegations contained in paragraph 56 are denied as to this answering defendant.

SECOND CLAIM FOR RELIEF - NEGLIGENCE

57. Paragraphs 1 through 56 of this Answer are hereby re-alleged and incorporated by reference as are fully set forth herein.

58. The allegations contained in paragraph 58 are denied as to this answering defendant.

59. The allegations contained in paragraph 59 are denied as to this answering defendant.

60. The allegations contained in paragraph 60 are denied as to this answering defendant.

61. The allegations contained in paragraph 61 are denied as to this answering defendant.

62. The allegations contained in paragraph 62 are denied as to this answering defendant.

63. The allegations contained in paragraph 63 are denied as to this answering defendant.

64. The allegations contained in paragraph 64 are denied as to this answering defendant.

65. The allegations contained in paragraph 65 are denied as to this answering defendant.

THIRD CLAIM FOR RELIEF – GROSS NEGLIGENCE

66. Paragraphs 1 through 65 of this Answer are hereby re-alleged and incorporated by reference as are fully set forth herein.

67. The allegations contained in paragraph 67 are denied as to this answering defendant.

68. The allegations contained in paragraph 68 are denied as to this answering defendant.

69. The allegations contained in paragraph 69 are denied as to this answering defendant.

70. The allegations contained in paragraph 70 are denied as to this answering defendant.

71. The allegations contained in paragraph 71 are denied as to this answering defendant.

72. The allegations contained in paragraph 72 are denied as to this answering defendant.

73. The allegations contained in paragraph 73 are denied as to this answering defendant.

74. The allegations contained in paragraph 74 are denied as to this answering defendant.

FOURTH CLAIM FOR RELIEF – LOSS OF CONSORTIUM

75. Paragraphs 1 through 74 of this Answer are hereby re-alleged and incorporated as are fully set forth herein.

76. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 76, and the same are therefore denied.

77. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 77, and the same are therefore denied.

78. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 78, and the same are therefore denied.

79. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 79, and the same are therefore denied.

80. This answering defendant does not have sufficient information to form a belief as to the truth or falsity of the allegations contained in paragraph 80, and the same are therefore denied.

FIFTH CLAIM FOR RELIEF: PIERCING THE CORPORATE VEIL

81. Paragraph 1 through 80 of this Answer are hereby re-alleged and incorporated by reference as are fully set forth herein.

82. The allegations contained in paragraph 82 are denied as to this answering defendant.

83. The allegations contained in paragraph 83 are denied as to this answering defendant.

84. The allegations contained in paragraph 84 are denied as to this answering defendant.

85. The allegations contained in paragraph 85 are denied as to this answering defendant.

86. The allegations contained in paragraph 86 are denied as to this answering defendant.

87. The allegations contained in paragraph 87 are denied as to this answering defendant.

88. The allegations contained in paragraph 88 are denied as to this answering defendant.

89. The allegations contained in paragraph 89 are denied as to this answering defendant.

WHEREFORE, having fully answered the allegations contained in plaintiffs' Complaint, defendant Xerox State & Local Solutions, Inc. prays the court that:

1. Plaintiffs' Complaint be dismissed, and that they have and recover nothing from it;
2. The costs of this action be taxed against plaintiffs;
3. There be a trial by jury on all issues so triable; and
4. The court grant such other and further relief as it may deem just and proper.

Respectfully submitted, this the 3rd day of June, 2014.

/s/ Bryan T. Simpson

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Defendant Xerox State & Local Solutions, Inc.'s Answer was filed electronically on those entities that have properly registered for such electronic service:

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This the 3rd day of June, 2014.

/s/ Bryan T. Simpson

Bryan T. Simpson